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CLERK, U.S. DISTRICT COURT  
DULUTH, MINNESOTA

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

Mary Swenson Plaintiff(s),

vs.

(Scott-Duren)

Case No. 24-cv-954 JRT/LIB  
(To be assigned by Clerk of District Court)

John Kuehni  
Susan Kuehni  
Cathi Ivanschek  
Kendall Swenson  
Kimberly Dotseth

DEMAND FOR JURY TRIAL

YES ☒

NO ☐

Defendant(s).

(Enter the full name(s) of ALL defendants in  
this lawsuit. Please attach additional sheets  
if necessary).

COMPLAINT

PARTIES

1. List your name, address and telephone number. Do the same for any additional plaintiffs.

a. Plaintiff

Name

Mary Swenson

Street Address

3810 Cadden Way

County, City

San Diego

State & Zip Code

CA 92117

Telephone Number

619-348-1238

619-323-7579

SCANNED

MAR 16 2024 *MP*

U.S. DISTRICT COURT DULUTH

2. List all defendants. You should state the full name of the defendant, even if that defendant is a government agency, an organization, a corporation, or an individual. Include the address where each defendant may be served. Make sure that the defendant(s) listed below are identical to those contained in the above caption.

a. Defendant No. 1

Name John Kuehni et al  
 Street Address 3286 Mt Carol Dr  
 County, City San Diego  
 State & Zip Code CA 92117

b. Defendant No. 2

Name Kendall Swenson  
 Street Address 2847 180th Ave NE  
 County, City Ham Lake  
 State & Zip Code MN 55304

c. Defendant No. 3

Name Kim Dotseth / Blend Reality  
 Street Address 7770 Regents Road  
 County, City #113-275  
 State & Zip Code San Diego, CA  
 92122

**NOTE: IF THERE ARE ADDITIONAL PLAINTIFFS OR DEFENDANTS, PLEASE PROVIDE THEIR NAMES AND ADDRESSES ON A SEPARATE SHEET OF PAPER.**

Check here if additional sheets of paper are attached: ☒

Please label the attached sheets of paper to correspond to the appropriate numbered paragraph above (e.g. Additional Defendants 2.d., 2.e., etc.)

## JURISDICTION

Federal courts are courts of limited jurisdiction. Generally, two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case involving the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one state sues a citizen of another state and the amount of damages is more than \$75,000 is a diversity of citizenship case.

3. What is the basis for federal court jurisdiction? (*check all that apply*)

☒ Federal Question

☐ Diversity of Citizenship

4. If the basis for jurisdiction is Federal Question, which Federal Constitutional, statutory or treaty right is at issue? List all that apply.

5. If the basis for jurisdiction is Diversity of Citizenship, what is the state of citizenship of each party? Each Plaintiff must be diverse from each Defendant for diversity jurisdiction.

Plaintiff Name:

State of Citizenship:

Defendant No. 1:

State of Citizenship:

Defendant No. 2:

State of Citizenship:

**Attach additional sheets of paper as necessary and label this information as paragraph 5.**

**Check here if additional sheets of paper are attached.** ☐

6. What is the basis for venue in the District of Minnesota? (*check all that apply*)

☐ Defendant(s) reside in Minnesota

☒ Facts alleged below primarily occurred in Minnesota

☒ Other: explain

CA birth, MN Adoption +  
Trust Conversion Divorce

## STATEMENT OF THE CLAIM

Describe in the space provided below the basic facts of your claim. The description of facts should include a specific explanation of how, where, and when each of the defendants named in the caption violated the law, and how you were harmed. Each paragraph must be numbered

separately, beginning with number 7. Please write each single set of circumstances in a separately numbered paragraph.

7.

See attached

**Attach additional sheets of paper as necessary.**

**Check here if additional sheets of paper are attached:** ☒

**Please label the attached sheets of paper to as Additional Facts and continue to number the paragraphs consecutively.**

#### **REQUEST FOR RELIEF**

State what you want the Court to do for you and the amount of monetary compensation, if any, you are seeking.

Signed this 15<sup>th</sup> day of March 2024

Signature of Plaintiff Mary Swenson  
Mailing Address (Scott -  
3810 Cadden way Duren)  
San Diego, CA 92117  
Telephone Number  
619-348-1238  
619-323-7579

Note: All plaintiffs named in the caption of the complaint must date and sign the complaint and provide his/her mailing address and telephone number. Attach additional sheets of paper as necessary.

C/o Safe Haven  
please mail to:  
Mary Swenson  
414 W. 1st St  
Duluth, MN  
55802